

REMARKS

Claims 68-85 and 107-117 are presently pending in this application. Claims 68, 80, 82, 84 and 85 have been amended to resolve clerical issues and delete certain features of these claims. The amendments to claims 68, 80, 82, 84 and 85 were not made with respect to any statutory rejection of these claims or for the purposes of patentability, but rather these claims have been amended to cover additional embodiments of the invention.

Claims 68-85 were rejected under 35 U.S.C. § 103 over the combination of U.S. Patent No. 6,249,055 issued to Dubin, the Lowenheim text on *Electroplating*, the Alkire article entitled "*Transient Behavior During Electrodeposition onto a Metal Strip of High Ohmic Resistance*," U.S. Patent No. 5,685,970 issued to Ameen et al., and U.S. Patent No. 4,401,521 issued to Ohmura et al. The applicants do not concede to the merits of this rejection because the combination of features in each of the independent claims 60, 80, 82, 84 and 85 is not disclosed or suggested by the foregoing applied references. For example, without having the present claims, it would not have been obvious to selectively combine portions of five different references to come up with the claimed combinations of features in these claims. Moreover, even when combined, the five applied references still fail to disclose initially using a low current to plate a small amount of metal onto the wafer, subsequently using a higher current to plate substantially more metal onto the workpiece, and then annealing the workpiece at a temperature to produce more desirable grain sizes for conducting electricity.

Claims 68-85 are further patentable over the applied references because U.S. Patent No. 6,249,055 issued to Dubin does not qualify as prior art under 35 U.S.C. § 102. Enclosed is a Declaration of Thomas L. Ritzdorf under 37 C.F.R. § 1.131 that establishes (a) a conception date before the February 3, 1998, filing date of the Dubin reference, and (b) appropriate diligence to reduction to practice. The present rejection of claims 68-85 under Section 103, therefore, should be withdrawn.

In light of the foregoing, the pending claims comply with 35 U.S.C. § 112 and are patentable over the applied art. The applicants accordingly respectfully request reconsideration of the application and a mailing of a Notice of Allowance. If Examiner Leader has any questions or believes a teleconference would further expedite prosecution of this application, he is encouraged to contact the undersigned at (206) 359-3258.

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Respectfully submitted,

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